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James K. Smith
Director
Federal Relations

February 21, 1996

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: **Ex Parte Statement**
Number Portability
Docket 95-116

Dear Mr. Caton:

On February 20, 1996, Mr. Terry Appenzeller, Vice President - Open Market Strategy and I met with Mr. Matt Harthun, Mr. Jason Karp, Ms. Susan McMaster, and Ms. Jennie Su of the Policy and Program Planning Division to discuss issues raised in this proceeding as set forth in the attachments.

Sincerely,

Attachments

cc: M. Harthun (w/o attach.)
J. Karp (w/o attach.)
S. McMaster (w/o attach.)
J. Su (w/o attach.)

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Long Term Number Portability Discussion

C.C. Docket 95-116

February 20, 1996

ICC Number Portability Workshop Progress Report

- Update to Brad Behounek's (ICC Staff)
Discussion of November 5, 1995**

ICC Number Portability Workshop Progress Report/Significant Accomplishments

How Progress Occurred

- Industry consensus top priority rather than debate
- Assume national/international impact
- Distributed documentation to industry forums, states, interested parties
- Evolution focus - "Network of Networks" vision
- Aggressive RBOC leadership/cooperation
- Steering committee/leadership committee/subcommittees for specific functions

Progress/Significant Accomplishments (chronology)

- | | |
|--|-------|
| • Determined planning scope for Illinois | 7/95 |
| • Established planning principles and criteria for selecting call model architecture | 7/95 |
| • Selection of Location Routing Number (LRN) as call model architecture * | 9/95 |
| • Obtained switch vendor commitment to deliver LRN software by 2Q'97 * | 10/95 |
| • Developed detailed switching and signaling generic requirements for LRN * | 11/95 |
| • Developed NPAC/SMS requirements and issued RFP for administrator * | 2/96 |
| • Stipulation and Agreement reached among participants * | 2/96 |

* Firsts in the Nation

The Following States Are Directly Utilizing the Documentation and/or Processes Used in the ICC Number Portability Workshop

- California
 - Georgia
 - Michigan
 - Wisconsin
- Colorado
 - Indiana
 - New York
- Florida
 - Maryland
 - Ohio
- and Canada**

Purpose of the ICC Number Portability Workshop

Near Term: Develop, evaluate and recommend a wireline service provider number portability solution and propose an implementation plan.

Phase I

- Chicago LATA (MSA-1)
- Competitively neutral
- Technically and economically feasible
- Meets planning criteria

Long Term: Explore desirability and feasibility of expanding to wireless networks, location portability, service portability, other enhancements.

Phase II

ICC Number Portability Workshop - Planning Principles & Key Mandatory Criteria

- 1. Plan must be nationally compatible.**
- 2. The call model must accommodate all forms of number portability (service provider, location, service) and migratable to wireless networks (when feasible).**

Service provider portability is the first priority.
- 3. Plan must be transparent to end users.**

Both ported and non-portable numbers must be able to originate and terminate in the participating networks and interconnecting non-participating networks.
- 4. Plan must be reciprocal between networks.**

Participating carriers implement the same architecture and are not disadvantaged in capabilities. (Architecture must not require routing or control through incumbent LEC)
- 5. All three forms of database triggers must be accommodated (Originating, N-1, Terminating).**

ICC Number Portability Workshop - Planning Principles & Key Mandatory Criteria (continued)

- 6. The database administration will be performed by a neutral third party (similar to 800 service).
All participating networks must have access to the database.**
- 7. Plan should not introduce network degradation or loss in features and functions for any participating or interconnecting non-participating networks.**
- 8. Plan must use existing network infrastructure and standards to the greatest extent possible.**
- 9. Number resources must be conserved to the extent possible.**
- 10. The architecture utilized cannot be proprietary or have license fees associated with it.**
- 11. Plan must accommodate and insure that 911/E911 operates properly.**
- 12. Initially, the participating carriers agree to utilize the existing rating boundaries of incumbents.**

LNP Framework

Attribute		Description	Weight	
	1. End User Impacts		I	C
	A. Toll Indicator	Provide an alert to end users to indicate they have initiated a toll call. This alert may be a tone or brief "announcement"	10	
	B. Call Redirection Transparency	Customer will perceive no difference when a number is ported	25	
	C. Ubiquity	Portability available to all wireline customers within selected service area	M	
	D. Directory Listing	<u>OPEN POLICY ISSUE</u> - Must provide mechanized directory info	10	
	E. Repair	<u>OPEN POLICY ISSUE</u> - 611 or separate repair numbers?	15	
	F. Number Change Required	No number change should be required	M	
	G. Calls Requiring Intercept Treatment	Centralized intercept systems shall receive proper public number for announcement or operator routing	M	
		Sub Total	60	
	2. Triggering			
	A. Originating	Solution shall be capable of performing DB dip from originating office (within NP service area)	M	
	B. N-1	Solution shall be capable of performing DB dip from N-1 office	M	
	C. Terminating	Solution shall be capable of performing DB dip from terminating office	M	
	D. AIN	Functions with Advanced Intelligent Network software: 1. Release 0.0 2. Release 0.1 3. Release 0.2	40	
	E. IN	Functions with Intelligent Network software	10	
	F. AIN Triggers		20	

* Change
A Addition
D Deleted

M - Mandatory
(1000 Points)

8/8/95

ICC, NP Workshop
I - Importance

C - Compliance
3 - Fully Complies
2 - Partially Complies
1 - Somewhat Complies
0 - Does Not Comply

Overall Architecture Selection - ICC Number Portability Workshop

- **LRN (Location Routing Number) as Permanent Solution - Unanimous Agreement Among Selectors:**

Ameritech, AT&T, Cellular One, GTE, MCI Metro, MFS, Sprint/Centel, Teleport, ICC Staff

- **Based on:**
 - **Ability to Meet Planning Principles and Criteria**
 - **Technical Feasibility for All Participating Networks**
 - **Number Resource Conservation**
 - **Evolution Capability**
 - **Other Factors...**

Workshop Formed Seven Subcommittees To Resolve Key Issues of Implementation

- **Number Portability Administration Center (NPAC)/SMS**
 - **RFP Issued February 6, 1996**
 - **15 Respondents Interested**
 - **Target Initial Test Date: December 1, 1996**
- **Generic Requirements Documentation**
 - **Documentation Issued November 15, 1995**
 - **Working on Second Release**
- **Rating & Billing**
 - **Use Existing Rating Boundaries for Initial Implementation**
 - **Working on SPID and Location Portability Issues**
- **Network Operations**
 - **Target Lab-To-Lab LRN Tests Begin January 1, 1997**
 - **Full Scale Test Plan**
- **Cost Recovery, Funding, Tariffs**
 - **Cost Recovery Proposals**
 - **Working on Cost Identification**
- **Operator Services**
 - **Requirements incorporated into switch generic document**
- **Leadership Team**
 - **Cross Team Issues**
 - **Phase I/Phase II Implementation Plans**

ICC Number Portability Workshop - Stipulation and Agreement

- **Signatories to the Agreement concur in the selection of LRN as the call model architecture**
- **Chicago Area (MSA-1) only**
- **Begin implementation in 3Q 1997**
- **Service Provider Portability with limited geographic portability (rate center boundaries)**
- **Demonstrates, prior to a Commission Order, commitment to implement LRN to switch vendors**
- **Joint petition and joint witness supporting ICC order adopting Stipulation and Agreement**

*** Expect Order to Be Issued In March 1996**

- * **Signature to Stipulation/Joint Petition: Ameritech, AT&T, GTE, MCI, MFS, Sprint/Centel, TCG**

Issues and Recommendations
C.C. Docket 95-116

C.C. Docket 95-116 Issues and Recommendations

1. Jurisdiction:

- Illinois should be encouraged to continue LNP implementation as planned.**
- Clear demonstration of progress in solving a complex local exchange competition issue.**
- Illinois has served as a model, willing to continue.**
- Do not preempt.**

2. National Plan:

- ICC workshop recognizes a need for national compatibility and inter-operability.**
- Multiple national call model architecture would not be economical, would delay implementation and produce technical interface problems.**
- A single national call model architecture is recommended: LRN**
- Enhancements to a LRN baseline architecture could be added later and vary by geography .**

3. Policy Guidelines:

- FCC should establish national policy guidelines for baseline implementation to insure compatibility and broad policy goals for future evolution.**
- ICC workshop encourages FCC to incorporate Illinois' planning and principles.**

C.C. Docket 95-116 Issues and Recommendations

4. Technical Feasibility:

- ICC workshop believes LRN will be technically feasible by July 1, 1997, based on second quarter 1997 general availability of LRN software.
- Extensive testing, delivery of equipment and software will be required to establish with certainty the technical feasibility date of LRN.

5. Implementation Timeframes:

- States should determine implementation timeframes based on development of competition, geography, and other factors unique to each state.
- Technical feasibility date does not equal implementation date.
- Phased implementation plan by geographic area (with facility-based competitors) is recommended.
- Bona Fide Request process is not appropriate trigger for implementation.
- A date certain for implementation is premature.
- Possible method to encourage implementation is to require state progress reports.

C.C. Docket 95-116 Issues and Recommendations

6. Database Administration:

- Recommend regional databases be eventually established.**
- Need to test on a small scale, then expand.**
- Many operation issues have not yet been tested or resolved.**
- Governance and cost recovery issues are not yet resolved.**

7. Cost Recovery:

- Costs have not yet been identified, only broad gauge estimates or proprietary vendor submissions to specific carriers to date.**
- Costs need to be divided into categories to determine how they are to be recovered (see next page)**
- Establishment of a competitively neutral cost recovery mechanism may require a special Federal/State Joint Board agreement.**
- Industry is still divided on nature of costs and how cost recovery should be implemented.**
- ICC workshop is working on an end user “pass through” cost recovery mechanism in Cost Recovery Subcommittee.**

Cost Recovery Framework for Long-Term Number Portability (LNP)

<u>LNP Model</u>	<u>Cost Elements</u>	<u>Cost Recovery Mechanism</u>
NPAC/SMS (shared)	<ul style="list-style-type: none"> • Set up NPAC - Initial Cost • Administration - On-going • Transactions - On-going 	<ul style="list-style-type: none"> • Shared among carriers <ul style="list-style-type: none"> - Telephone Numbers? - Lines? - Usage?
LRN Specific Costs (Varies by Network)	<ul style="list-style-type: none"> • LRN switch software • SS7 augmentation (processing & links) • STP augmentation (additional LNP load) • LNP SCPs • Operations support systems (Billing, DN admin, LIDB admin, Local SMS, Maintenance & Repair, Ordering & Processing) • On-going costs 	<ul style="list-style-type: none"> • Competitively neutral cost recovery mechanism needed (FCC/States) • May only be required for Incumbents • End user surcharge? • Additional carrier charge? • Who is cost causer? • Who benefits?
Baseline Infrastructure (Varies by Network)	<ul style="list-style-type: none"> • SS7 capability • IN or AIN capability • Switch replacement or upgrades 	<ul style="list-style-type: none"> • Each network responsible • General application for variety of services • Not LNP specific cost

National Policy Framework Recommendation

Federal	<ul style="list-style-type: none">• Determine Public Interest• Set National Planning Principles & Policy• Determine Role of States and Implementation Planning Reports• Monitor Industry Forums & States Activities• Participate in Cost Recovery Joint Board
States	<ul style="list-style-type: none">• Determine Who Participates• Determine Where to Implement within States• Determine When to Implement within States• Participate in Cost Recovery Joint Board
Providers & Vendors	<ul style="list-style-type: none">• Solve Technical/Operational/Administrative Issues• Participate in Industry Forums• Test and Implement the Plan• Administer the Plan

Interim Number Portability (RCF/DID) Discussion
C.C. Docket 95-116

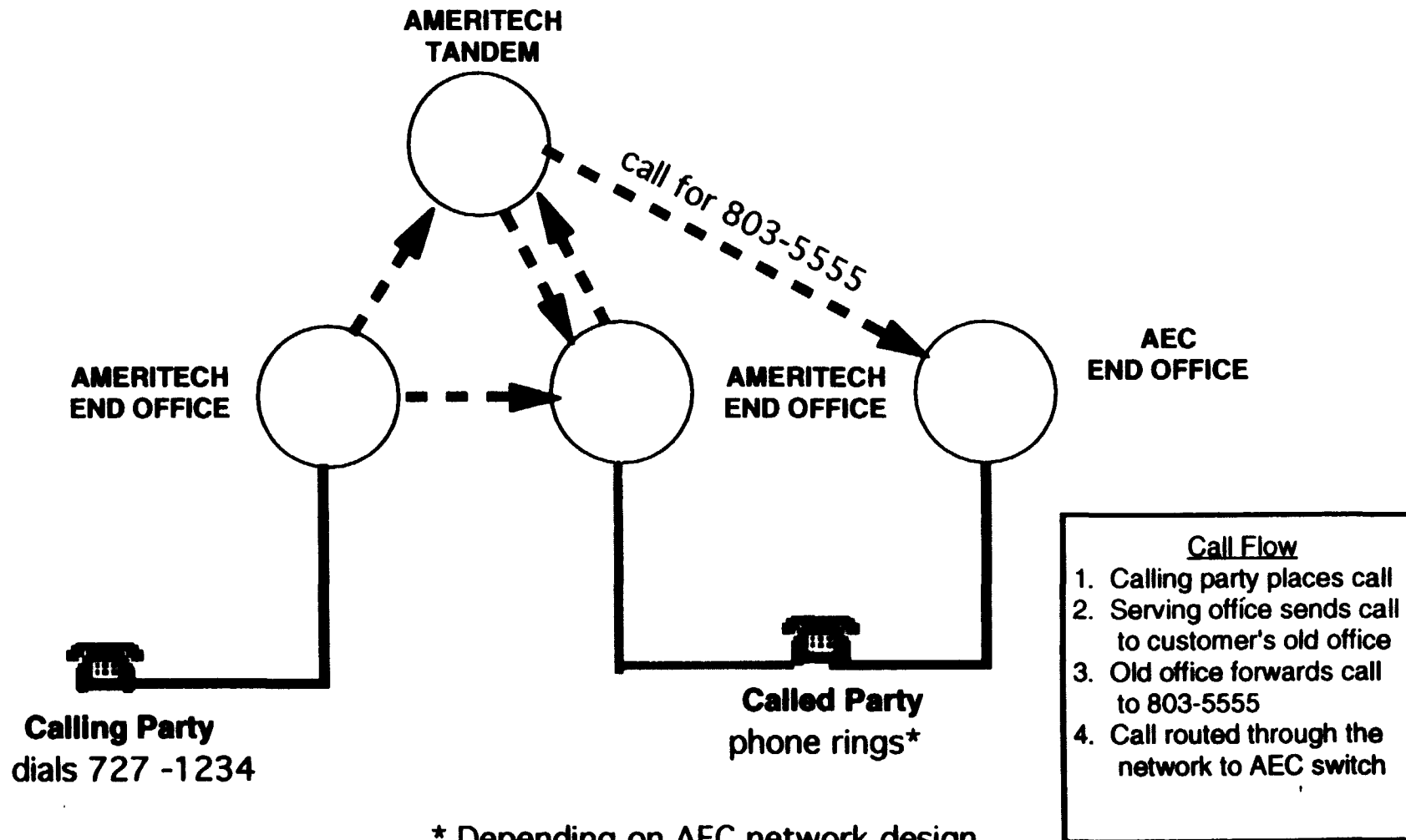
February 20, 1996

Interim Number Portability

Only Currently Available Methods for Providing Service Provider Portability without Implementing a Database System Are:

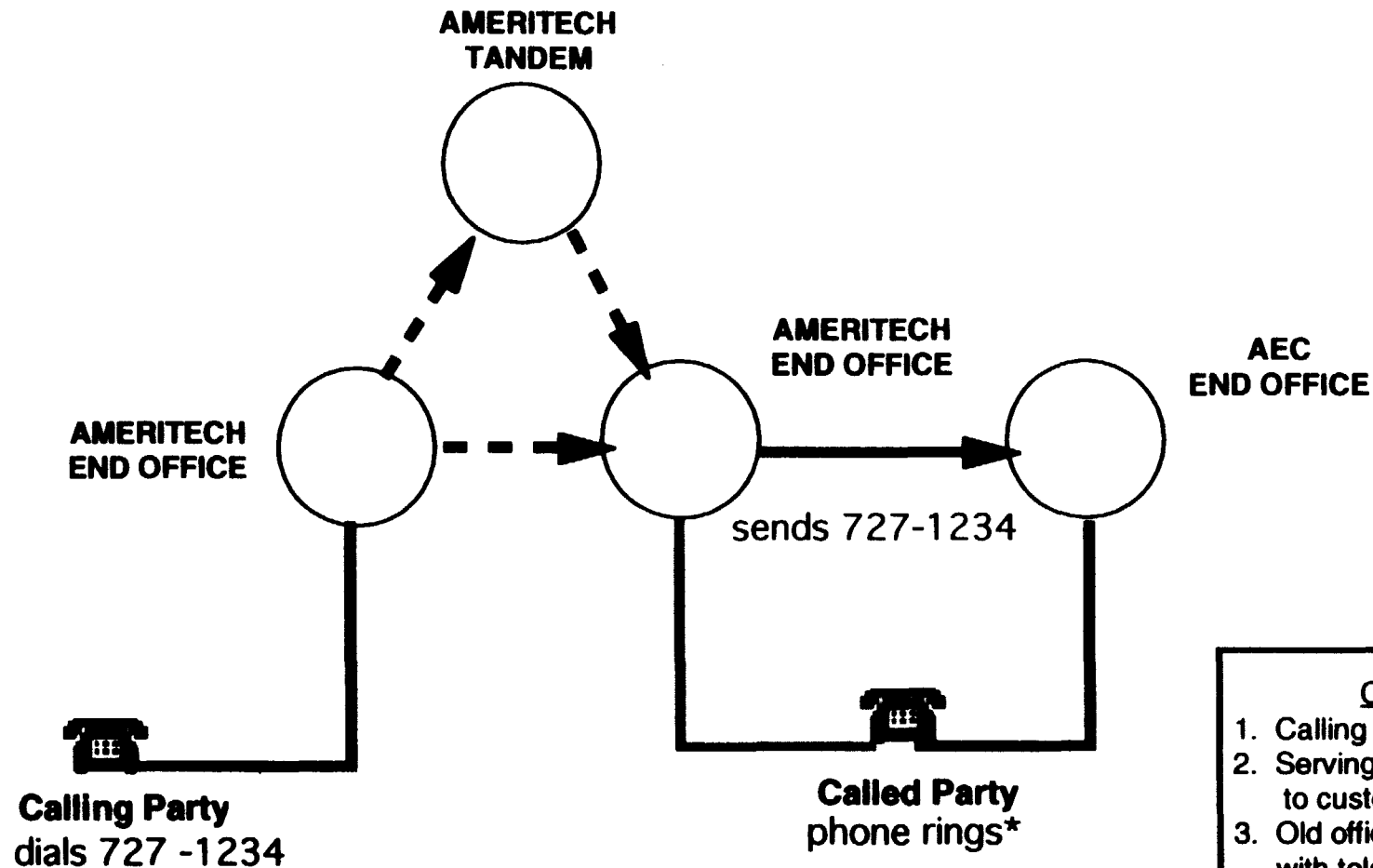
- **Service Provider Number Portability - Remote (SPNP - Remote): Similar to Remote Call Forwarding (RCF)**
- **Service Provider Number Portability - Direct (SPNP - Direct): Similar to Direct Inward Dialing (DID)**
- **Both methods have limitations, generally features and functions, performance limitations, must utilize LEC network to perform the functions. Pricing has been an issue.**

**SERVICE PROVIDER NUMBER PORTABILITY (SPNP) - REMOTE
AEC REQUESTS THAT CALLS TO THE OLD NUMBER BE FORWARDED TO A NEW AEC NUMBER**



* Depending on AEC network design
Customer may or may not be
aware of AEC number assigned

SERVICE PROVIDER NUMBER PORTABILITY (SPNP) - DIRECT
AEC REQUESTS THAT CALLS TO THE OLD NUMBER BE SENT DIRECTLY TO AEC



* At the option of the AEC
the customer may or may
not be assigned a
separate AEC number

Call Flow

1. Calling party places call
2. Serving office sends call to customer's old office
3. Old office sends call with telephone number to the AEC office via a direct trunk group

Interim Number Portability Ameritech Region

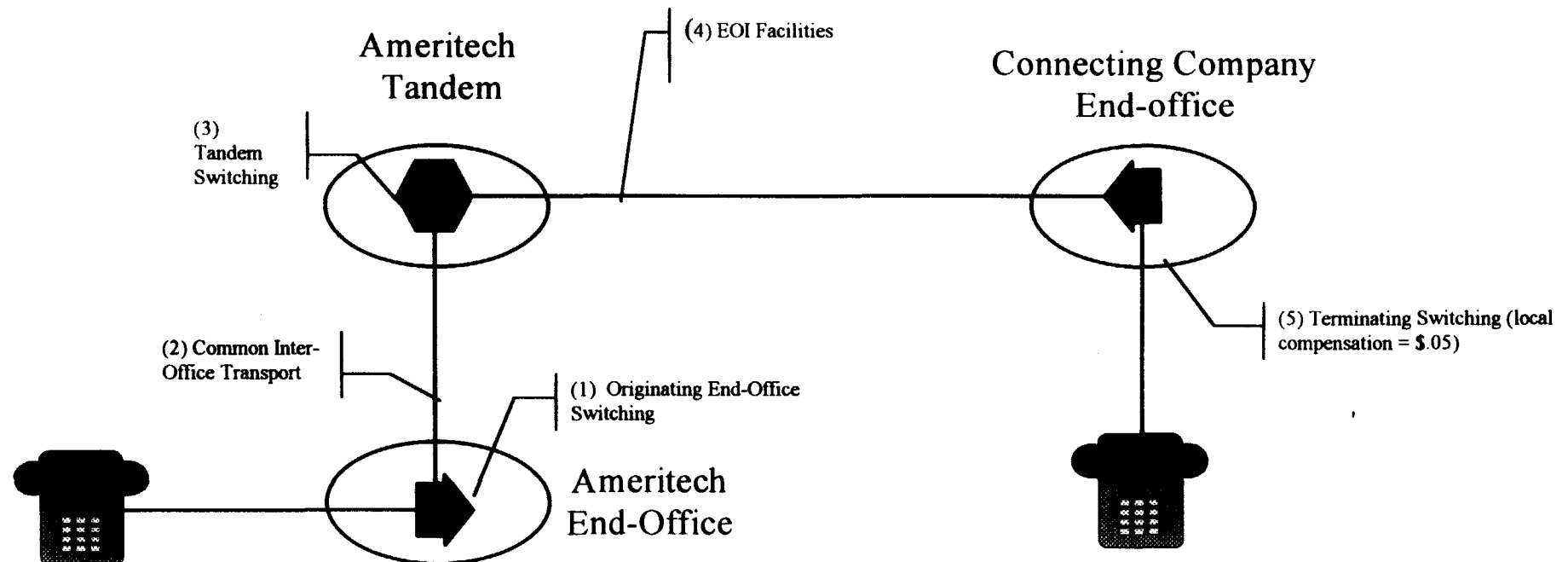
State	Availability	Type of Service	Rate	Other Commission Activity
Indiana	Est. Tariff filing 1 qtr. 97	SPNP-Remote (RCF) SPNP-Direct (DID)	Propose same as current Illinois Rates	Addressed in Local Competition Docket
Illinois	Tariff filed 5/23/95 (filed pursuant to ICC Order in Docket No. 94-0096)	SPNP-Remote (RCF) SPNP-Direct (DID)	<p><u>SPNP-Remote</u> + \$3.00 per no./per mo. + usage charge for MOUs in excess of 1000 per mo. + \$1.10 add. call paths (1-5) + \$1.60 add. call paths (6-90)</p> <p><u>SPNP-Direct</u> + \$29.00 Service Est. Charge (per CO) + \$10.00/\$130.00 per mo. per VG/DS1 channel termination + \$15.00/\$235.00 per VG/DS1 channel termination INC + \$0.01 per no./per mo. + \$5.00 INC + applicable transport charges</p>	<p>Current rates are in effect pending investigation in ICC Docket No. 95-0296 for compliance with ICC directive that service be cost-based with a "reasonable" level of contribution. Hearing is scheduled for 5/6/96 with order approximately 8/96.</p>
Michigan	Tariff filed 3/27/95 (Filed pursuant to interim MPSC Order in Case No. U-10647)	SPNP-Remote (RCF) SPNP-Direct (DID)	<p><u>SPNP-Remote</u> + \$1.14 per no./per mo. + \$1.60 add. call paths, per contract</p> <p><u>SPNP-Direct</u> + \$20 per no./per mo. + applicable transport charges</p>	Addressed in Local Competition Docket; recent state legislation requires interim number portability to be offered at LRSIC. Current interim rates are below cost and will be revised to cost with conclusion of current docket.
Ohio	Est. Tariff filing 3/96	SPNP-Remote (RCF) SPNP-Direct (DID)	Propose same as current Illinois Rates	Addressed in Local Competition Docket
Wisconsin	Est. Tariff filing 4/96	SPNP-Remote (RCF) SPNP-Direct (DID)	Propose same as current Illinois Rates	Addressed in Local Competition Docket

February 16, 1996

Service Provider Number Portability - Remote Identification of Incremental Service Components

Baseline Scenario

Call routing and completion of Ameritech originated call to CLEC customer without number portability.



Service Provider Number Portability - Remote Identification of Incremental Service Components

Intra-Office Call

Call routing and Completion of an Ameritech originated intra-office call to CLEC customer via SPNP-Remote.

